

DP BARCODE No.: D387642      FILE SYMBOL No.: 84542-4      DECISION No.: 445379  
Product Name: Cupron Anti-Dustmite Fibers and Fabrics  
PC Code: 042401      ACTION CODE: R 340      FOOD Use: No

DATE OUT: June 06, 2011

SUBJECT: End Use Product Chemistry Review  
Product Name: Cupron Anti-Dustmite Fibers and Fabrics

FROM: Bruce F. Kitchens, Chemist  
Product Chemistry Team  
Technical Review Branch/RD (7505P)

*Bruce F. Kitchens*  
*06 June 2011*  
*SFBM 6/7/11*

TO: RM 13, Mark Suarez/Samantha Hulkower  
Insecticide Branch / RD (7505P)

Company Name: Cupron Incorporated  
Formulation Type: Solid

#### INTRODUCTION:

The registrant has submitted an application for an alternate formula for the registered end-use product, Cupron Anti-Dustmite Fibers and Fabrics. The alternate formulas are the result of the use of different inert ingredients. The active ingredient in this product is an unregistered source of Copper (II) Oxide. In support of this request, the registrant submitted two alternate formula (1&2) Confidential Statements of Formula (CSF) both dated 07 Feb 2011. The Technical Review Branch (TRB) has been asked to review this submission.

#### SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Copper (II) Oxide (4.1% a.i.)
2. Has the registrant claimed substantial similarity to a registered product?  
☐ Yes; ☒ No
3. All of the source materials of the active ingredient are derived from registered sources- ☐ Yes ☒ No  
The source of the active ingredient is not registered and is manufactured by a different producer.
4. All inert ingredients have been screened by IIAB (and found to be approved for the proposed labeled uses.  
☒ Yes ☐ No

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5. Confidential Statements of Formula:

☐ Basic - Dated: 30 July 2007

☒ Alternate CSFs (1-2) – Dated 07 Feb 2011

Alternate CSFs complies with 40CFR§152.43: ☐ Yes; ☒ No

Certified limits for the active ingredient on the proposed alternate CSF are different from the active ingredient certified limits on the currently approved basic CSF

**CONCLUSIONS:**

The TRB has reviewed the product chemistry data submitted for the proposed end-use product and has concluded that:

1. The proposed alternate CSFs dated 07 Feb 2011 are not acceptable because the product contains a source of the active ingredient which has not been evaluated by the Agency. The use of the unregistered source of an active ingredient requires two sets of product chemistry data. Group A and B product chemistry data is required for the proposed end-use product and for the unregistered source of the active ingredient. The registrant is advised to submit Group A and B product chemistry for the unregistered source of the active ingredient.
2. The active ingredient certified limits must be the same on the proposed alternate and basic formula. This criterion is outlined in 40 CFR 152.43 with regard to alternate formulations. The registrant is advised to provide an explanation for the different certified limits for the basic and proposed alternate CSFs.